

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP.,

Plaintiff,

v.

INTERNATIONAL BUSINESS MACHINES
CORP.,

Defendant.

Case No. 2:24-cv-00064-JRG

JURY TRIAL DEMANDED

DEFENDANT'S CORPORATE DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant International Business Machines Corp. (“IBM”) discloses that there is no parent corporation or publicly held corporation that owns 10% or more of IBM’s stock.

Dated: April 15, 2024

Respectfully submitted,

/s/ Brandon H. Brown

Todd M. Friedman (*pro hac vice*)

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, NY 10022

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Email: todd.friedman@kirkland.com

Brandon H. Brown

State Bar No. 266347

KIRKLAND & ELLIS LLP

555 California Street

San Francisco, CA 94104

Telephone: (415) 439-1400

Facsimile: (415) 439-1500

Email: brandon.brown@kirkland.com

Of Counsel:

Andrea L. Fair

Texas State Bar No. 24078488

E-mail: andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
1507 Bill Owens Parkway
Longview, TX 75604
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)

*Attorneys for Defendant
International Business Machines Corp.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on April 15, 2024.

Dated: April 15, 2024

/s/ Brandon H. Brown

Brandon H. Brown